

1 **UNITED STATES DISTRICT COURT**
2 **CENTRAL DISTRICT OF CALIFORNIA**

3 RICHARD SOTELO, on behalf of
4 himself and all others similarly situated,

5 Plaintiff,

6 vs.

7
8 RAWLINGS SPORTING GOODS
9 COMPANY, INC.,

10 Defendant.

CASE NO. 2:18-cv-09166-GW-MAA

Hon. George H. Wu

11 **DECLARATION OF JANINE L.**
12 **POLLACK IN SUPPORT OF**
13 **PLAINTIFF'S OPPOSITION TO**
14 **DEFENDANT'S MOTION TO**
15 **STRIKE THE REPORT AND**
16 **TESTIMONY OF STEFAN**
17 **BOEDEKER**

Date: December 3, 2020

Time: 8:30 A.M.

Crtrm.: 9D

18 I, Janine Pollack, hereby declare as follows:

19 1. I am a partner at Calcaterra Pollack LLP, counsel for Plaintiff and
20 Proposed Co-Class Counsel in the above-captioned action. I am a member in good
21 standing of the state bars of New York and New Jersey, and have been admitted
22 *pro hac vice* in this case.

23 2. I respectfully submit this declaration in support of Plaintiff's
24 Opposition to Defendant's Motion to Strike the Report and Testimony of Stefan
25 Boedeker ("Opposition"). Except as otherwise noted, the facts set forth in this
26 declaration are based in part upon my personal knowledge, and I would
27 competently testify to them if called upon to do so.

28 3. Attached hereto as Exhibit 1 is a true and correct copy of excerpts of
the deposition transcript of Stefan Boedeker, taken in this matter on February 14,
2020.

1 I declare under penalty of perjury under the laws of the State of California
2 that the foregoing is true and correct.

3
4 Dated: November 12, 2020

By: /s/ Janine L. Pollack

5 Janine Pollack, Esq.

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10 *Proposed Co-Class Counsel*
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